

## SULLIVAN AND GRABER

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May 15, 2018

### Via Electronic Filing

Clerk  
Somerset County Courthouse  
20 N. Bridge Street  
Somerville, NJ 08876-1262

Re: NJPLIGA v. TODD KOPPEL, M.D., ET AL.  
Docket No. TO BE ASSIGNED  
Our File No. 12442-000-3

Dear Sir or Madam:

Enclosed please find:

- (X) Verified Complaint
- (X) CIS Form
- (X) Filing Fee \$250.00 - Acct #140340

Would you please:

- (X) File

Very truly yours,

LEE S. BEFELER

LSB:las  
Enclosures

Lee S. Befeler - NJ ID No. 024661987  
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(973) 540-0877

Attorney for Plaintiff  
Our File No. 12442-000-3

NEW JERSEY PROPERTY-LIABILITY  
INSURANCE GUARANTY ASSOCIATION,

Plaintiff,

vs.

TODD KOPPEL, M.D., GARDEN STATE  
PAIN MANAGEMENT, P.A., JOHN DOES  
1-100, JANE DOES 1-100, ABC INC. 1-  
100 and DEF INC. 1-100,

Individual Defendants,

and

NORTH AMERICAN PARTNERS IN  
ANESTHESIA, NORTHERN NJ ORTHO  
SPECIALISTS, TRINITAS REGIONAL  
MEDICAL CENTER, TRINITAS  
ANESTHESIA ASSOCIATES, BACK  
WORKS CHIROPRACTIC, P.C., SADDLE  
BROOK SURGICENTER, COASTAL  
ANESTHESIA ASSOCIATES, METRO  
ANESTHESIA ASSOCIATES, CLIFTON  
SURGERY CENTER, CITIMED  
SERVICES, P.A., ST. JOSEPH  
REGIONAL MEDICAL CENTER,  
SURGICORE SURGICAL CENTER,  
HEALTH PLUS SURGERY CENTER,  
DYNAMIC SURGERY CENTER,  
SPECIALTY SURGERY OF SECAUCUS,  
ASISH PATEL, SUN PHARMACY, and  
GLEN RIDGE PHARMACY,

Interested Party Defendants.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: SOMERSET COUNTY

Docket No.

Civil Action

VERIFIED COMPLAINT  
AND JURY DEMAND

The plaintiff NEW JERSEY PROPERTY-LIABILITY INSURANCE GUARANTY ASSOCIATION (hereinafter "NJPLIGA") by way of Verified Complaint against the defendants TODD KOPPEL, M.D., GARDEN STATE PAIN MANAGEMENT, P.A., JOHN DOES 1-100, JANE DOES 1-100, ABC INC. 1-100 and DEF INC. 1-100 state as follows:

#### NATURE OF ACTION AND RELIEF REQUESTED

1. This is an action brought by NJPLIGA against defendants Todd Koppel, M.D., Garden State Pain Management, P.A., John Does 1-100, Jane Does 1-100, ABC Inc. 1-100 and DEF Inc. 1-100 for violations of New Jersey statutes and regulations and the New Jersey Insurance Fraud Prevention Act, N.J.S.A. 17:33A-1 et seq.

2. To address their injuries, the plaintiff seeks an Order:

- i. Declaring that the defendants are ineligible to receive Personal Injury Protection ("PIP") benefits from the plaintiff and that the plaintiff is not obligated to pay claims the defendants have submitted to the plaintiff;
- ii. Declaring that the defendants are not entitled to Personal Injury Protection ("PIP") benefits from the plaintiff and that the plaintiff is not obligated to pay claims the defendants have submitted to the plaintiff; which contain fabricated and misleading billing and treatment records regarding among other things, patients' complaints, patients' symptoms, patients' diagnoses, patients' examinations, the location of the service and the individuals providing the treatment, examinations and/or testing;
- iii. Declaring the defendants are not entitled to PIP benefits from the plaintiff for any bills based on their payment of kickbacks to referring providers;
- iv. Declaring that any previously decided arbitration awards do not have to be paid pending the outcome of this action;
- v. Staying all arbitrations and lawsuits the defendants have instituted against the plaintiff;

- vi. Awarding the plaintiff restitution and reimbursement of all monies paid to the defendants;
- vii. Awarding the plaintiff compensatory and treble damages under the New Jersey Insurance Fraud Prevention Act, N.J.S.A. 17:33A-1 et seq., including but not limited to, compensatory damages, investigation costs, attorney's fees, costs of suit and interest.

### FIRST COUNT

1. The plaintiff NJPLIGA is authorized by statute to provide statutory PIP benefits to individuals that qualify under the New Jersey Property-Liability Insurance Guaranty Association Act, N.J.S.A. 17:30A-1 et seq. and N.J.S.A. 39:6-61, et seq.

2. Pursuant to N.J.S.A. 17:1-8.1, N.J.S.A. 17:1-15e, and P.L. 2003, c. NJPLIGA is directed to assume responsibility for all management, administration and claims functions of the Unsatisfied Claim and Judgment Fund (UCJF) and various insolvent insurance carriers including but not limited to Consumer First and IFA.

3. The defendant Garden State Pain Management, P.A. is a business entity holding itself out as performing medical treatment and testing for individuals involved in motor vehicle accidents.

4. The defendant Todd Koppel, M.D., holds himself out as performing treatment and testing for individuals involved in motor vehicle accidents.

5. The defendants John Doe 1-100, represent medical providers including but not limited to physicians and chiropractors that hold themselves out as performing treatment and testing for individuals involved in motor vehicle accidents and may have treated claimants of the plaintiff.

6. The defendants Jane Doe 1-100 represent individuals that hold themselves out as performing treatment and testing for individuals involved in motor vehicle accidents and may have treated claimants of the plaintiff.

7. The defendants ABC Inc. 1-100 represent business entities that may have provided treatment for individuals involved in motor vehicle accidents that had claims against the plaintiff.

8. The defendants DEF Inc. 1-100 represent business entities that may have provided billing and management services for medical providers treating individuals involved in motor vehicle accidents that had claims against the plaintiff.

9. The defendants have submitted claims to the plaintiff for the payment of PIP benefits for medical treatment and testing they claim to have performed.

10. At all relevant times, the defendants submitted and continue to submit claims for PIP medical expense benefits under statutorily-provided coverage by the plaintiff for medical treatment and testing the defendants claim they provided to individuals who are involved in the automobile accidents.

11. At all relevant times, the defendants intentionally and knowingly submitted false, fraudulent and misleading billing, treatment and testing records in which the defendants:

- i. Falsely represented the complaints, physical examination findings, injuries and need for treatment and testing;
- ii. Falsely represented that physical examinations were performed;
- iii. Falsely represented the individual providing the examinations, treatment and testing of patients;
- iv. Falsely represented that the medical treatment and testing the defendants claim they provided were medically reasonable or

necessary within the requirements of N.J.S.A. 39:6A-1 et seq., the New Jersey No Fault Act, N.J.A.C. 11:3-4.1 et seq. and violated controlling requirements of law including N.J.S.A. 39:6A-1 et seq., N.J.A.C. 11:3-4.1 et seq., N.J.A.C. 13:35-1.1 et seq., N.J.A.C. 13:35-2.6, N.J.A.C. 13:35-6.5, N.J.S.A. 45:1-1 et seq., N.J.S.A. 17:30A-1 et seq., N.J.S.A. 39:6-61 et seq., N.J.S.A. 17:1-8.1, N.J.S.A. 17:1-15e, and P.L. 2003;

- v. Paid kickbacks to chiropractors, physicians and other individuals for the referral of patients;
- vi. Billed for procedures not performed;
- vii. Were not qualified to perform the procedures billed;
- viii. Did not have hospital privileges to perform the procedures billed and/or performed; and
- ix. Did not have medical malpractice coverage for the procedures billed and/or performed.

12. The defendants were not eligible to recover benefits for the treatment and testing they allegedly performed based on the violations of controlling statutes and regulations.

13. The defendants submitted claims to the plaintiff for benefits for the treatment and testing they allegedly performed with knowledge that they were not eligible to recover benefits.

14. The defendants' actions were undertaken for the purpose of defrauding the plaintiff by the submission of false, fraudulent and misleading claims for the payment of PIP medical expense benefits.

15. In reasonable reliance upon the defendants' actions and representations, both direct and implied, the plaintiff paid some of the defendants' claims for PIP benefits.

16. At all relevant times, the defendants' conduct violated the New Jersey Insurance Fraud Prevention Act, N.J.S.A. 17:33A-1 et seq.

17. The defendants engaged in a pattern and practice of violating the New Jersey Insurance Fraud Prevention Act.

WHEREFORE, the plaintiff NJPLIGA seeks a judgment against the defendants Todd Koppel, M.D., Garden State Pain Management, P.A., John Does 1-100, Jane Does 1-100, ABC Inc. 1-100 and DEF Inc. 1-100 jointly and severally:

- i. Declaring pursuant to the New Jersey Uniform Declaratory Judgment Act, N.J.S.A. 2A:16-1 et seq. that the defendants are not entitled to PIP benefits from the plaintiff and that the plaintiff is not obligated to pay claims submitted by or on behalf of the defendants.
- ii. Awarding the plaintiff restitution and reimbursement of all monies paid to the defendants Todd Koppel, M.D., Garden State Pain Management, P.A., John Does 1-100, Jane Does 1-100, ABC Inc. 1-100 and DEF Inc. 1-100.
- iii. Staying all arbitrations and lawsuits that have been instituted against the plaintiff by or on behalf of the defendants Todd Koppel, M.D., Garden State Pain Management, P.A., John Does 1-100, Jane Does 1-100, ABC Inc. 1-100 and DEF Inc. 1-100.
- iv. Vacating all arbitration awards and judgments that have been obtained against the plaintiff by or on behalf of the defendants Todd Koppel, M.D., Garden State Pain Management, P.A., John Does 1-100, Jane Does 1-100, ABC Inc. 1-100 and DEF Inc. 1-100.
- v. Staying the enforcement of all arbitration awards and judgments that have been obtained against the plaintiff by or on behalf of the defendants.
- vi. Requiring the defendants to indemnify the plaintiff for all PIP medical expense benefits paid to other medical providers as a result of the defendants' fraudulent conduct.
- vii. Awarding the plaintiff compensatory and treble damages including, but not limited to, investigation costs, attorney's fees, costs of suit and interest.

- viii. Awarding the plaintiff whatever other relief the Court deems appropriate and just.

## SECOND COUNT

(Breach of Contract)

1. The plaintiff repeats all of the allegations contained in the First Count and incorporates them as if set forth at length herein.
2. The defendants submitted claims to the plaintiff for reimbursement of no fault benefits as assignees under the statutory benefits afforded by the plaintiff to the patients.
3. The plaintiff NJPLIGA is governed by New Jersey statutes, Administrative Codes, regulations and Decision Point Review Plan.
4. The defendants, as assignees, are subject to the New Jersey statutes, Administrative Codes, regulations and Decision Point Review Plan governing the plaintiff.

WHEREFORE, the plaintiff NJPLIGA seeks a judgment against the defendants Todd Koppel, M.D., Garden State Pain Management, P.A., John Does 1-100, Jane Does 1-100, ABC Inc. 1-100 and DEF Inc. 1-100 jointly and severally:

- i. Declaring pursuant to the New Jersey Uniform Declaratory Judgment Act, N.J.S.A. 2A:16-1 et seq. that the defendants are not entitled to PIP benefits from the plaintiff and that the plaintiff is not obligated to pay claims submitted by or on behalf of the defendants.
- ii. Awarding the plaintiff restitution and reimbursement of all monies paid to the defendants Todd Koppel, M.D., Garden State Pain Management, P.A., John Does 1-100, Jane Does 1-100, ABC Inc. 1-100 and DEF Inc. 1-100.
- iii. Staying all arbitrations and lawsuits that have been instituted against the plaintiff by or on behalf of the defendants Todd Koppel, M.D.,



Garden State Pain Management, P.A., John Does 1-100, Jane Does 1-100, ABC Inc. 1-100 and DEF Inc. 1-100.

- iv. Vacating all arbitration awards and judgments that have been obtained against the plaintiff by or on behalf of the defendants Todd Koppel, M.D., Garden State Pain Management, P.A., John Does 1-100, Jane Does 1-100, ABC Inc. 1-100 and DEF Inc. 1-100.
- v. Staying the enforcement of all arbitration awards and judgments that have been obtained against the plaintiff by or on behalf of the defendants.
- vi. Requiring the defendants to indemnify the plaintiff for all PIP medical expense benefits paid to other medical providers as a result of the defendants' fraudulent conduct.
- vii. Awarding the plaintiff compensatory and treble damages including, but not limited to, investigation costs, attorney's fees, costs of suit and interest.
- viii. Awarding the plaintiff whatever other relief the Court deems appropriate and just.

### THIRD COUNT

(Breach of Covenant of Good Faith and Fair Dealing)

1. The plaintiff repeats all of the allegations contained in the First and Second Counts and incorporates them as if set forth here at length.

2. The defendants owe a duty to the plaintiff to abide by the implied covenant of good faith and fair dealing, which by operation of law, is embodied in the rules, regulations, statutes and Plan of the plaintiff.

3. Through the course of conduct previously alleged, the defendants have breached the covenant of good faith and fair dealing in numerous instances. The defendants' actions have, among other things, deprived the plaintiff of its rights under the statutes, regulations and Plan and are contrary to the spirit of the New Jersey

Property-Liability Insurance Guaranty Association, the Unsatisfied Claim and Judgment Fund and their enabling statutes.

4. As a consequence of the defendants' breaches of the covenant of good faith and fair dealing, the plaintiff has suffered damages.

WHEREFORE, the plaintiff NJPLIGA seeks a judgment against the defendants Todd Koppel, M.D., Garden State Pain Management, P.A., John Does 1-100, Jane Does 1-100, ABC Inc. 1-100 and DEF Inc. 1-100 jointly and severally:

- i. Declaring pursuant to the New Jersey Uniform Declaratory Judgment Act, N.J.S.A. 2A:16-1 et seq. that the defendants are not entitled to PIP benefits from the plaintiff and that the plaintiff is not obligated to pay claims submitted by or on behalf of the defendants.
- ii. Awarding the plaintiff restitution and reimbursement of all monies paid to the defendants Todd Koppel, M.D., Garden State Pain Management, P.A., John Does 1-100, Jane Does 1-100, ABC Inc. 1-100 and DEF Inc. 1-100.
- iii. Staying all arbitrations and lawsuits that have been instituted against the plaintiff by or on behalf of the defendants Todd Koppel, M.D., Garden State Pain Management, P.A., John Does 1-100, Jane Does 1-100, ABC Inc. 1-100 and DEF Inc. 1-100.
- iv. Vacating all arbitration awards and judgments that have been obtained against the plaintiff by or on behalf of the defendants Todd Koppel, M.D., Garden State Pain Management, P.A., John Does 1-100, Jane Does 1-100, ABC Inc. 1-100 and DEF Inc. 1-100.
- v. Staying the enforcement of all arbitration awards and judgments that have been obtained against the plaintiff by or on behalf of the defendants;
- vi. Requiring the defendants to indemnify the plaintiff for all PIP medical expense benefits paid to other medical providers as a result of the defendants' fraudulent conduct.
- vii. Awarding the plaintiff compensatory and treble damages including, but not limited to, investigation costs, attorney's fees, costs of suit and interest.

- viii. Awarding the plaintiff whatever other relief the Court deems appropriate and just.

FOURTH COUNT

(Unjust Enrichment)

1. The plaintiff repeats all of the allegations contained in the First, Second and Third Counts and incorporates them as if set forth here at length.

2. The defendants' actions resulted in the unjust enrichment to the defendants to the detriment of the plaintiff.

WHEREFORE, the plaintiff NJPLIGA seeks a judgment against the defendants Todd Koppel, M.D., Garden State Pain Management, P.A., John Does 1-100, Jane Does 1-100, ABC Inc. 1-100 and DEF Inc. 1-100 jointly and severally:

- i. Declaring pursuant to the New Jersey Uniform Declaratory Judgment Act, N.J.S.A. 2A:16-1 et seq. that the defendants are not entitled to PIP benefits from the plaintiff and that the plaintiff is not obligated to pay claims submitted by or on behalf of the defendants.
- ii. Awarding the plaintiff restitution and reimbursement of all monies paid to the defendants Todd Koppel, M.D., Garden State Pain Management, P.A., John Does 1-100, Jane Does 1-100, ABC Inc. 1-100 and DEF Inc. 1-100.
- iii. Staying all arbitrations and lawsuits that have been instituted against the plaintiff by or on behalf of the defendants Todd Koppel, M.D., Garden State Pain Management, P.A., John Does 1-100, Jane Does 1-100, ABC Inc. 1-100 and DEF Inc. 1-100.
- iv. Vacating all arbitration awards and judgments that have been obtained against the plaintiff by or on behalf of the defendants Todd Koppel, M.D., Garden State Pain Management, P.A., John Does 1-100, Jane Does 1-100, ABC Inc. 1-100 and DEF Inc. 1-100.
- v. Staying the enforcement of all arbitration awards and judgments that have been obtained against the plaintiff by or on behalf of the defendants.

- vi. Requiring the defendants to indemnify the plaintiff for all PIP medical expense benefits paid to other medical providers as a result of the defendants' fraudulent conduct.
- vii. Awarding the plaintiff compensatory and treble damages including, but not limited to, investigation costs, attorney's fees, costs of suit and interest.
- viii. Awarding the plaintiff whatever other relief the Court deems appropriate and just.

#### FIFTH COUNT

##### **Interested parties - Medical Providers**

1. The plaintiffs repeat each and every allegation of the preceding Counts and incorporate them as if set forth here at length.

2. The following parties may have legal rights, duties, obligations and/or other interests affected by this action. They are named as interested parties pursuant to the provisions of the New Jersey Declaratory Judgment Act, N.J.S.A. 2A:16-50 et seq.

3. The interested party defendants (including John Doe defendants, Jane Doe defendants, ABC defendants and DEF defendants) North American Partners in Anesthesia, Northern NJ Ortho Specialists, Trinitas Regional Medical Center, Trinitas Anesthesia Associates, Back Works Chiropractic, P.C., Saddle Brook Surgicenter, Coastal Anesthesia Associates, Metro Anesthesia Associates, Clifton Surgery Center, Citimed Services, P.A., St. Joseph Regional Medical Center, Surgicore Surgical Center, Health Plus Surgery Center, Dynamic Surgery Center, Specialty Surgery of Secaucus, Asish Patel, Sun Pharmacy and Glen Ridge Pharmacy are medical providers who perform medical services, administer anesthesia, host procedures performed by the defendants or provide medication prescribed by the defendants.

4. The interested parties named in this Count are licensed medical professionals, licensed medical facilities and/or medical/surgical practices who are or should have been registered with the New Jersey Department of Health also known as Physician-owned ambulatory surgery centers who are charged with and presumed to have knowledge of the significant qualifying requirements of the law pertaining to their delivery of medical services.

5. The interested party defendants have submitted claims to the plaintiff for medical services that they allegedly provided with the defendants.

6. The interested party defendants may have known that Todd Koppel was paying kickbacks for the referrals of patients.

7. The interested party defendants may have known that the procedures billed by Dr. Koppel were not being performed.

8. The interested party defendants knew or should have known that Dr. Koppel did not have the requisite training and hospital privileges or alternative privileges granted by the New Jersey Board of Medical Examiners to perform the procedures being billed for and/or performed.

9. The interested party defendants are not entitled to PIP reimbursement for any service billed by Dr. Todd Koppel and/or Garden State Pain Management, P.A. because those services were performed in violation of New Jersey law.

10. The interested party defendants are named in this action for the purposes of discovery pursuant to Arcel v. Ashland Chemical Co., Inc., 152 N.J. Super. 471 (Law Div. 1979) and N.J.S.A. 39:6A-13(g).

WHEREFORE, the plaintiff seeks judgment:

- i. Declaring that the interested party defendants are not entitled to PIP reimbursement;
- ii. Compelling the interested party defendants to provide the information and documents requested in the plaintiff's demands for discovery;
- iii. Declaring that in the event the defendants fail to comply with the plaintiff's demands for discovery, they shall be ineligible for no fault PIP payments from the plaintiff; and
- iv. Granting any other relief that the Court may deem appropriate and just.

DEMAND FOR DISCOVERY

Demand is hereby made upon each of the defendants for discovery as follows:

1. Provide fully responsive and certified answers to the plaintiff's First Set of Interrogatories attached as Exhibit A to this Complaint in accordance with the Court Rules.
2. Respond to the plaintiff's First Notice to Produce attached as Exhibit B to this Complaint in accordance with the Court Rules.
3. Produce for depositions the person or persons with knowledge of the subject matter of this action within 30 days of the defendants' providing full and complete responses to the plaintiff's First Set of Interrogatories and First Notice to Produce.
4. Produce the defendant Todd Koppel, M.D. and Asish Patel for depositions within 30 days of the defendants' providing full and complete responses to the plaintiff's First Set of Interrogatories and First Notice to Produce.
5. Produce for depositions a representative of each of the interested party defendants.

JURY DEMAND

The plaintiff hereby demands a trial by a jury of six (6) persons on all issues herein.

TRIAL COUNSEL DESIGNATION

Pursuant to R. 4:25-5, Lee S. Befeler, Esq. is hereby designated as trial counsel for the plaintiff.

CERTIFICATION OF NO OTHER ACTION

1. The within matter in controversy is not the subject of any other action pending in any Court or any pending Arbitration proceeding with the exception of those actions and arbitrations listed in Exhibit 1 and any additional arbitration demands and PIP suits that the defendants or other individuals and entities may have filed that are unknown at this time.

2. No other parties should presently be joined in this action.

  
\_\_\_\_\_  
LEE S. BEFELER

DATED: May 15, 2018

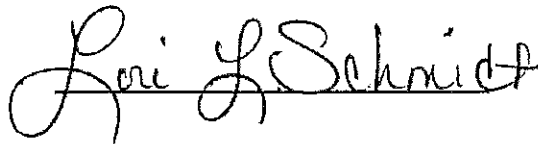
**VERIFICATION**

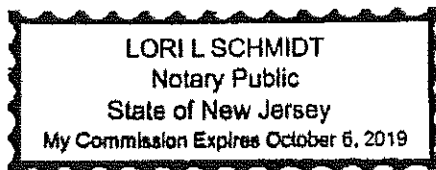
DOUGLAS HILLMAN, of full age, being duly sworn, upon his oath deposes and says:

I am the Director of Claims of the plaintiff New Jersey Property-Liability Insurance Guaranty Association. I have read the attached Verified Complaint. I have knowledge of the facts set forth. I verify that the allegations contained in the Complaint are true to my knowledge, information and belief.

  
DOUGLAS HILLMAN

SWORN TO and SUBSCRIBED  
before me this 16<sup>th</sup> day  
of May, 2018







**EXHIBIT 1**

BACK WORKS CHIROPRACTIC P.C. a/s/o J.G.P.  
Forthright No. NJ1802001772451; Claim No. 1614398

CITIMED SERVICES PA a/s/o A.A.C.  
Forthright No. NJ1801001768862; Claim No. 1615120

CITIMED SERVICES PA a/s/o B.A.  
Forthright No. NJ1801001769350; Claim No. 1615120

CLIFTON SURGERY CENTER a/s/o A.A.  
Forthright No. NJ1707001739536; Claim No. 1615120

CLIFTON SURGERY CENTER a/s/o B.A.  
Forthright No. NJ1707001739533; Claim No. 1615120

CLIFTON SURGERY CENTER a/s/o D.P.  
Forthright No. NJ1804001781405; Claim No. 1611565

COASTAL ANESTHESIA ASSOCIATES a/s/o P.T.  
Forthright No. NJ1803001774569; Claim No. 1512319

COASTAL ANESTHESIA ASSOCIATES a/s/o V.M.  
Forthright No. NJ1707001741252; Claim No. 1611456

DR. TODD KOPPEL (D/B/A GARDEN STATE PAIN MGMT.) a/s/o A.A.  
Forthright No. NJ1712001762331; Claim No. 1615120

DR. TODD KOPPEL (DBA GARDEN STATE PAIN MGMT.) a/s/o B.A.  
Forthright No. NJ1710001753820; Claim No. 1615120

DYNAMIC SURGERY CENTER a/s/o A.A.C.  
Forthright No. NJ1801001768818; Claim No. 1615120

GARDEN STATE PAIN MANAGEMENT a/s/o B.H.  
Forthright No. NJ1802001773407; Claim No. 1611242

GARDEN STATE PAIN MANAGEMENT a/s/o D.P.  
Forthright No. NJ1802001771163; Claim No. 1611565

GARDEN STATE PAIN MANAGEMENT a/s/o E.V.  
Forthright No. NJ1801001765723; Claim No. 1615992

GARDEN STATE PAIN MANAGEMENT a/s/o F.L.  
Forthright No. NJ1801001768349; Claim No. 1614928

GARDEN STATE PAIN MANAGEMENT, PA A/S/O J.C.  
Forthright No. NJ1703001722582; Claim No. 1610503

GARDEN STATE PAIN MANAGEMENT a/s/o J.V.  
Forthright No. NJ1801001766742; Claim No. 1710335

GARDEN STATE PAIN MANAGEMENT a/s/o L.G.  
Forthright No. NJ1711001759317; Claim No. 1610061

GARDEN STATE PAIN MANAGEMENT a/s/o L.T.  
Forthright No. NJ1801001766740; Claim No. 1614838

GARDEN STATE PAIN MANAGEMENT & SADDLEBROOK SURGICENTER a/s/o P.T.  
Forthright No. NJ1710001756433; Claim No. 1512319

GARDEN STATE PAIN MANAGEMENT a/s/o R.J.  
Forthright No. NJ1712001763507; Claim No. 1613353

GARDEN STATE PAIN MANAGEMENT a/s/o R.R.  
Forthright No. NJ1803001779733; Claim No. 1611025

GARDEN STATE PAIN MANAGEMENT AND NORTHERN NJ ORTHO SPECIALISTS  
a/s/o T.W.  
Forthright No. NJ1611001701454; Claim No. 1510171

GARDEN STATE PAIN MANAGEMENT a/s/o V.D.  
Forthright No. NJ1711001759072; Claim No. 1610438

GARDEN STATE PAIN MANAGEMENT a/s/o V.M.  
Forthright No. NJ1705001733293; Claim No. 1611456

HEALTH PLUS SURGERY CENTER a/s/o A.A.C.  
Forthright No. NJ1801001768842; Claim No. 1615120

METRO ANESTHESIA ASSOCIATES a/s/o B.A.  
Forthright No. NJ1712001762526; Claim No. 1615120

NORTH AMERICAN PARTNERS IN ANESTHESIA a/s/o J.C.A.  
Forthright No. NJ1708001743214; Claim No. 1610503

NORTH AMERICAN PARTNERS IN ANESTHESIA a/s/o P.T.  
Forthright No. NJ1801001765705; Claim No. 1512319

SADDLE BROOK SURGICENTER a/s/o L.L.  
Forthright No. NJ1802001771712; Claim No. 1610061

SADDLE BROOK SURGICENTER & GARDEN STATE PAIN MANAGEMENT a/s/o V.B.R.

Forthright No. NJ1709001748934; Claim No. 1712015

SPECIALTY SURGERY OF SECAUCUS a/s/o V.M.

Forthright No. NJ1703001723078; Claim No. 1611456

ST. JOSPEH REGIONAL MEDICAL CENTER OUTPATIENT a/s/o A.A.

Forthright No. NJ1705001732314; Claim No. 1615120

SURGICORE SURGICAL CENTER, LLC a/s/o A.A.

Forthright No. NJ1711001760149; Claim No. 1615120

TRINITAS ANESTHESIA ASSOCIATES a/s/o B.H.

Forthright No. NJ1803001774407; Claim No. 1611242

TRINITAS ANESTHESIA ASSOCIATES a/s/o D.P.

Forthright No. NJ1802001770605; Claim No. 1611565

TRINITAS ANESTHESIA ASSOCIATES, LLC a/s/o L.L.G.

Forthright No. NJ1710001751983; Claim No. 1610061

TRINITAS ANESTHESIA ASSOCIATES a/s/o T.W.

Forthright No. NJ1704001726918; Claim No. 1510171

TRINITAS REGIONAL MEDICAL CENTER a/s/o A.A.

Forthright No. NJ1710001756250; Claim No. 1615120

TRINITAS REGIONAL MEDICAL CENTER a/s/o B.A.

Forthright No. NJ1711001760238; Claim No. 1615120

TRINITAS REGIONAL MEDICAL CENTER a/s/o B.H.

Forthright No. NJ1709001749094; Claim No. 1611242

TRINITAS REGIONAL MEDICAL CENTER a/s/o D.P.

Forthright No. NJ1801001765334; Claim No. 1611565

TRINITAS REGIONAL MEDICAL CENER a/s/o E.V.C.

Forthright No. NJ1709001748003; Claim No. 1615992

TRINITAS REGIONAL MEDICAL CENTER a/s/o J.C.

Forthright No. NJ1705001730523; Claim No. 1610503

TRINITAS REGIONAL MEDICAL CENTER a/s/o L.L.G.

Forthright No. NJ1704001728861; Claim No. 1610061

TRINITAS REGIONAL MEDICAL CENTER a/s/o P.T.  
Forthright No. NJ1702001715233, Claim No. 1512319

TRINITAS REGIONAL MEDICAL CENTER a/s/o R.J.  
Forthright No. NJ1705001732683; Claim No. 1613353

TRINITAS REGIONAL MEDICAL CENTER a/s/o T.W.  
Forthright No. NJ1605001673469; Claim No. 1510171

# Civil Case Information Statement

## Case Details: SOMERSET | Civil Part Docket# L-000652-18

**Case Caption:** NEW JERSEY PROPERTY- LIABILITY VS  
KOPPEL, M.D. T

**Case Initiation Date:** 05/17/2018

**Attorney Name:** LEE SCOTT BEFELER

**Firm Name:** SULLIVAN & GRABER

**Address:** 60 MAPLE AVENUE P.O. BOX 912

MORRISTOWN NJ 079630912

**Phone:**

**Name of Party:** PLAINTIFF : New Jersey Property-Liability

**Name of Defendant's Primary Insurance Company**

(if known): Unknown

**Case Type:** INSURANCE FRAUD

**Document Type:** Complaint with Jury Demand

**Jury Demand:** YES - 6 JURORS

**Hurricane Sandy related?** NO

**Is this a professional malpractice case?** NO

**Related cases pending:** NO

**If yes, list docket numbers:**

**Do you anticipate adding any parties (arising out of same transaction or occurrence)?** NO

## THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

**Do parties have a current, past, or recurrent relationship?** NO

**If yes, is that relationship:**

**Does the statute governing this case provide for payment of fees by the losing party?** NO

**Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:**

**Do you or your client need any disability accommodations?** NO

**If yes, please identify the requested accommodation:**

**Will an interpreter be needed?** NO

**If yes, for what language:**

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule* 1:38-7(b)

05/17/2018

Dated

/s/ LEE SCOTT BEFELER

Signed